

Exhibit D

Stanley, Michael

From: Hurley, Mitchell
Sent: Wednesday, September 6, 2023 7:48 PM
To: Kramer, Jeffrey; Wickouski, Stephanie
Cc: Feener, Sean; Chapman, Dean; Scott, Elizabeth D.; Lombardi, Nicholas; Stanley, Michael
Subject: RE: conference tomorrow

Hi Jeff, you mentioned you were going to send comments on the draft PO today, but I don't think I saw them, apologies if I missed an email.

Regarding scheduling, we think it will be important to give ourselves time to finish doc production, engage in depositions, and in advance of the hearing, to try to work out objections etc. re exhibits and designations. To that end we have prepared the below proposed schedule. What do you think?

- Complete Doc discovery: 9/15
- Witness lists: 9/18, by 12:00 Eastern
- Deposition Castellana: 9/21 (provided discovery done on rolling basis and finished by 9/15)
- Complete depositions: 9/24 (Sunday)
- Exchange exhibit lists and deposition designations: 9/24 (Sunday) by 12:00 Eastern
- Exchange objections: 9/25 by 12:00 Eastern
- Meet and confer re objections 9/26

Please let us know your thoughts. Also, as discussed today, we would be happy to meet and confer with you as early as tomorrow or Friday concerning Celsius' document requests to try to help streamline the process. Please let us know if you would like to do that.

Mitchell P. Hurley

[Akin](#)

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From: Kramer, Jeffrey <JKramer@lockelord.com>
Sent: Wednesday, September 6, 2023 6:09 PM
To: Hurley, Mitchell <mhurley@AkinGump.com>; Wickouski, Stephanie <swickouski@lockelord.com>
Cc: Feener, Sean <Sean.Feener@lockelord.com>; Chapman, Dean <dchapman@akingump.com>
Subject: RE: conference tomorrow

Thanks Mitch. Obviously we'll appear live if we need to, but we have no issue with asking the Court if the parties can appear by Zoom instead.

Jeff Kramer
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